

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NORTHEASTERN DIVISION**

DAVID CHRISTIAN, et. al.,)	
)	
Plaintiffs,)	Case No. 2:11cv0082
)	
v.)	
)	
SWALLOWS PRODUCE, INC. and)	Judge Sharp
JACKY R. SWALLOWS,)	
)	Magistrate Judge Brown
Defendants,)	
)	
and)	
)	
SWALLOWS PRODUCE, INC. and)	
JACKY R. SWALLOWS,)	
)	
Third-Party Plaintiffs,)	
)	
v.)	
)	
TWO BROTHERS FARM OF)	
GEORGIA, INC., a/k/a TWO)	
BROTHERS FARM, INC. and MICHEL)	
D. GERMAIN,)	
)	
Third-Party Defendants.)	

JOINT MOTION TO RESCHEDULE SCHEDULING CONFERENCE

Plaintiffs and Defendants Swallows Produce, Inc. and Jacky R. Swallows jointly move the Court to reschedule the Scheduling Conference currently set for Monday, February 27, 2012 at 1:30 p.m. until on or after Monday, March 12, 2012. (Doc. 25). The parties seek a two (2) week extension of the Scheduling Conference in order to allow Third-Party Defendants Two Brothers Farm of Georgia, Inc., a/k/a Two Brothers Farm, Inc. and Michel D. Germain to answer the Third-Party Complaint recently filed against them (Doc. 22) and to allow an attorney to enter an appearance on their behalf and to participate in the Scheduling Conference. Additionally, the

parties seek an extension of the Scheduling Conference in order to allow the Court to rule on Plaintiffs' Motion to Add Parties and to File First Amended Complaint. (Doc. 16).

WHEREFORE, the parties respectfully request that the Court reschedule the Scheduling Conference currently set for Monday, February 27, 2012 until on or after Monday, March 12, 2012.

Respectfully submitted,

/s/ Melody Fowler-Green per email consent
dated 2/22/2012

Melody Fowler-Green (TN Bar No. 023266)
Southern Migrant Legal Services
A Project of Texas RioGrande Legal Aid, Inc.
311 Plus Park Blvd. Ste 135
Nashville, TN 37217
Phone: 615-750-1200
Fax: 615-366-3349

mfgreen@trla.org

*Attorney for Plaintiffs Francillon Badio, David
Christian, Rosie Joseph, Addly Petitfrere,
Arnold Roynez, and Clara Roynez*

/s/ Gregory S. Schell per email consent dated
2/22/2012

Gregory S. Schell (FL Bar No. 287199)
Admitted Pro Hac Vice
Migrant Farmworker Justice Project
508 Lucerne Avenue
Lake Worth, FL 33460-3819
Phone: 561-582-3921
Fax: 561-582-4881

Greg@Floridalegal.org
Attorney for Plaintiffs

/s/ C. Eric Stevens

C. Eric Stevens (TN Bar No. 010632)
Rachel K. Ross (TN Bar No. 027501)
LITTLER MENDELSON, P.C.
3200 West End Avenue
Suite 500
Nashville, TN 37203
Telephone: 615.383.3033
Facsimile: 615.383.3323
estevens@littler.com
ross@littler.com
*Attorneys for Defendants Swallows Produce,
Inc. and Jacky R. Swallows*

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing has been served via the Court's ECF Mail System upon the following:

Melody Fowler-Green
Southern Migrant Legal Services
311 Plus Park Blvd. Ste 135
Nashville, TN 37217
Phone: 615-750-1200
Fax: 615-366-3349
mfgreen@trla.org

Gregory S. Schell
Migrant Farmworker Justice Project
508 Lucerne Avenue
Lake Worth, FL 33460-3819
Phone: 561-582-3921
Fax: 561-582-4881
Greg@Floridalegal.org

and via first class U.S. mail upon the following:

Michel Germain
853 N.W. 110 St.
Miami, FL 33168

Two Brothers Farm of Georgia, Inc.
c/o Michel Germain
853 N.W. 110 St.
Miami, FL 33168

on this the 22nd day of February, 2012.

/s/ C. Eric Stevens
C. Eric Stevens

Firmwide:109469049.1 069208.1001